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Purchaser Plaintiffs Gianasca and  
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*Additional Counsel Listed on Signature  
Page*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. 4:07-cv-5944  
Related MDL No. 1917

This Document Relates to  
All Indirect Purchaser Actions

AND  
STIPULATION ~~WITH [PROPOSED]~~ ORDER  
AS TO WITHDRAWAL OF MOTION TO  
AMEND AND ALL RELATED MOTIONS  
AND TO DISMISSAL WITH PREJUDICE  
AND WITHOUT COSTS

1 Pursuant to Civil Local Rule 7-12, Massachusetts Plaintiffs the Estate of the Late Barbara  
2 Caldwell (“Caldwell”) and Anthony Giasasca (“Giasasca”) and the undersigned Proposed  
3 Defendants (the “Proposed Defendants”), by and through their respective counsel, hereby agree  
4 and stipulate as follows:

5 WHEREAS, on September 16, 2022, Caldwell and Giasasca filed a Motion to Amend  
6 Complaint or Otherwise Pursue Pending Claims (the “Motion to Amend,” ECF No. 6072) and a  
7 Proposed Fifth Amended Complaint (the “Proposed Complaint,” ECF No. 6072-5) that seek to  
8 assert claims against the Proposed Defendants;

9 WHEREAS, on September 30, 2022, certain Proposed Defendants filed a Motion to  
10 Intervene for the Limited Purpose of Responding to Motion to Amend Complaint or Otherwise  
11 Pursue Pending Claims (the “Motion to Intervene,” ECF No. 6084);

12 WHEREAS, on December 22, 2022, Proposed Defendants Panasonic, Philips, and LG filed  
13 a Motion for Sanctions Pursuant to Federal Rule of Civil Procedure 11 and 28 U.S.C. § 1927 (the  
14 “Motion for Sanctions,” ECF No. 6126) that sought an award of fees, costs, and other appropriate  
15 relief against the undersigned counsel for Caldwell and Giasasca concerning the filing of the  
16 Motion to Amend and the Proposed Complaint;

17 WHEREAS, the parties disagree as to whether the claims of Caldwell and Giasasca  
18 asserted in *Brigid Terry, et al. v. LG Elecs., Inc., et al.* (Case No. 4:08-cv-01559), *Barbara*  
19 *Caldwell et al. v. Matsushita Elec. Ind. Co.* (Case No. 4:07-cv-06303), the Indirect Purchaser  
20 Plaintiffs’ Consolidated Amended Complaint (ECF No. 437), or the Indirect Purchaser Plaintiffs’  
21 Second Consolidated Amended Complaint (ECF No. 716) remain pending and constitute a basis  
22 for the claims Caldwell and Giasasca seek to assert in the Proposed Complaint;

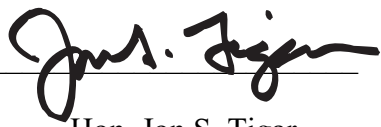
23 WHEREAS, the parties have met and conferred, and have agreed to resolve the Motion to  
24 Amend, the Motion for Sanctions, and any and all claims Caldwell and Giasasca had, has, or could  
25 have against the undersigned Proposed Defendants;

NOW, THEREFORE, the parties agree and stipulate to the following:

1. Caldwell and Gianasca withdraw the Motion to Amend and Proposed Complaint;
2. Caldwell and Gianasca voluntarily dismiss with prejudice any and all claims against the Proposed Defendants, including the claims Caldwell and Gianasca purport to assert in the Proposed Complaint;
3. Caldwell and Gianasca hereby release and agree to refrain henceforth from commencing, prosecuting, or asserting any and all claims, demands, actions, suits, or causes of action that Caldwell and Gianasca ever had, now have, or hereafter can, shall, or may have on account of, or in any way arising out of, the conduct alleged in the Proposed Complaint or any preceding complaint filed in, or transferred to, In re Cathode Ray Tube Antitrust Litigation, MDL No. 1917;
4. Proposed Defendants withdraw the Motion to Intervene;
5. Proposed Defendants Panasonic and Philips withdraw the Motion for Sanctions as to the relief requested by Panasonic and Philips;
6. Each party shall bear its own costs and fees.

**PURSUANT TO STIPULATION AND GOOD CAUSE APPEARING, IT IS SO ORDERED.**

Dated: February 23, 2023

  
Hon. Jon S. Tigar  
United States District Judge

Dated: February 23, 2023

Respectfully submitted,

/s/ Robert J. Bonsignore

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<sup>1</sup> MT Picture Display Co., Ltd. has been dissolved and completed final liquidation proceedings in Japan on May 23, 2019.

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Ltd., Hitachi America, Ltd., and Hitachi  
Electronic Devices (USA), Inc.*

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<sup>2</sup> Samsung SDI Mexico S.A. De C.V., Samsung SDI Brasil Ltda., Shenzhen Samsung SDI Co., Ltd., and Samsung SDI (Malaysia) Sdn. Bhd. have been dissolved.

/s/ Christopher M. Curran

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/s/ John M. Taladay

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